

For Clerk's Office Use		
Judge <u>R</u>	Recd Date	Grv.

For use by inmates in filing a complaint under **CIVIL RIGHTS ACT, 42 USC §1983**

INMATE NAME: Latron Dupree Brown

PRISONER NO.: 38102

PLACE OF CONFINEMENT: ACRJ 160 Peregrory lane Charlottesville VA 22902

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
ROANOKE DIVISION

CLERK'S OFFICE U.S. DIST. COURT  
AT ROANOKE, VA  
FILED

OCT 24 2014

Latron Dupree Brown  
Enter Full Name

Plaintiff

JULIA C. DUBLEY, CLERK  
BY: [Signature]  
DEPUTY CLERK

vs. Albermarle County police department

Dell Johnson, John McKay, Tavis Coffin, Jon Sultz

CIVIL ACTION NO. 7:14-CV-00576

M. Frazier, Hatter, Wormley, Mark Jones, McCall, Brake  
Enter Full Name(s)

Defendant(s)

A. Have you begun other actions in state or federal court dealing with the same facts involved in this action or otherwise relating to your imprisonment?

\_\_\_\_\_ Yes \_\_\_\_\_ ☒ No

B. If your answer to A is Yes, describe the action in the space below.

1. Parties to the Action: \_\_\_\_\_

2. Court: \_\_\_\_\_

3. Docket No.: \_\_\_\_\_

4. Judge: \_\_\_\_\_

5. Disposition: \_\_\_\_\_

(For example, is the case still pending? If not, what was the ruling? Was the case appealed?)

C. Have you filed any grievances regarding the facts of your complaint?

Yes \_\_\_\_\_ No ☒

1. If your answer is Yes, complete the enclosed verified statement, indicating the result. Please attach evidence of your exhaustion of all available grievance procedures.

2. If your answer is No, indicate the reason for failure to exhaust on the verified statement. You may be required to exhaust your claims through any applicable grievance procedures. Your complaint may be dismissed if you fail to exhaust all avenues of the grievance process in a timely fashion.

- D. Statement of Claim - State here briefly the facts of your case. Describe what action(s) each defendant took in violation of your constitutional rights. Include also the names of other persons involved, dates and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of different claims, number and set forth each claim in a separate paragraph. Use as much space as needed. You may attach extra paper if necessary.

Claim #1 - Supporting Facts - Tell your story briefly without citing cases or law.

---

---

---

Claim #2 - Supporting Facts - Tell your story briefly without citing cases or law.

---

---

---

Claim #3 - Supporting Facts - Tell your story briefly without citing cases or law.

---

---

---

- E. State what relief you seek from the Court. Make no legal arguments, cite no cases or statutes.

---

---

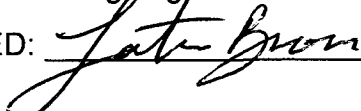
SIGNED THIS 10 DAY OF 21, 20 14.

  
(Signature of Each Plaintiff)

**VERIFICATION:**

I, Latron Dupree Brown, state that I am the plaintiff in this action and I know the content of the above complaint; that it is true of my own knowledge, except as to those matters that are stated to be based on information and belief, and as to those matters, I believe them to be true. I further state that I believe the factual assertions are sufficient to support a claim of violation of constitutional rights. Further, I verify that I am aware of the provisions set forth in 28 USC §1915 that prohibit an inmate from filing a civil action or appeal, if the prisoner has, three or more occasions, while incarcerated, brought an action or appeal in federal court that are dismissed on the grounds that it was frivolous, malicious or failed to state a claim upon which relief may be granted, unless the prisoner is in imminent danger of serious physical injury. I understand that if this complaint is dismissed on any of the above grounds, I may be prohibited from filing any future actions without the pre-payment of filing fees.

I declare under penalty of perjury the foregoing to be true and correct.

DATED: 10-21-14 SIGNED: 

10/21/14

Claim 1: On 12-19-13 On hydrolic rd I was pulled Out Of the Vehicle that I was inside after Sgt Johnson busted the drivers side window Out with his handgun I was pulled to the ground then handcuffed Officers J. Seitz Mark Jones Sgt. Brake Officer Wormley and Tavis Coffin all place there hands and knees On top of my back as I layed face down posing no threat to Officers or resistance Dell Johnson started twisting my wrist until it broke he then placed his knee on top of my headd forcing my face into the Concrete.

Claim 2: On 12-19-13 On hydrolic rd Tavis Coffin ordered Officer McCall to tase me two times in the back while I layed face down handcuffed with out resistance posing no threat moving in pain from my wrist being broken. An Ambulance arrived Dell Johnson, Jon Seitz, Sgt Brake Officer McCall, Mark Jones, Wormley, Tavis Coffin denied me Medical treatment.

Claim 3: On 12-19-13 Officers Dell Johnson, M. Frazier, LT. Hatter John McKay entered my mothers home while no one was present and with out a Search warrant at ~~the mother's home~~ On this day of December 19, 2013 Charlottesville Virginia residence in Albemarle County.

Claim 4: On 12-19-13 On hydrolic rd T.Coffin pulled me Over at a stop light in a black Chevy Cruz with tinted windows he denied that this vehicle Contained a dash Camera. My attorney William Tanner Continued to ask for the evidence he was told by the Commonwealth Elliott J. Casey Several times that it was under investigation for months until my Court date, from Officer Mccall patrol Car a Video was given that had little to no view and tainted audio. In my transcript I have proof that Tavis coffin gave perjured testimony about what took place on 12-19-13 and also Video that have audio removed that held important information. 8 months after my arrest I was indicted with obstruction in efforts to justify excessive force that was used. Im suffering from physical injury headaches Scars to my face Severe back problems Permanent damage to my left hand emotional distress mental anguish Psychological harm and insomnia

As for relief Im seeking  
4 million in monetary and  
punitive damage

I now owe nearly 20,000 in hospital bills  
after having Surgery Completed